

UNITED STATES
TELEPHONE
ASSOCIATION

EX PARTE

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Federal Communications Commission
Office of Secretary

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Written Ex Parte
CC Docket No. 92-237

Dear Ms. Salas:

In its comments in the above-referenced docket, USTA recommended that small telephone companies be provided an opportunity to recover the costs of providing equal access capability, by permitting NECA pool members to recover 75 percent of the costs of replacing a switch through the pooled rates. While the provision of equal access capability may be a desirable goal, small telephone companies must be provided an opportunity to recover the associated costs, particularly if the company must replace its switch in order to provide such capability.

As discussed in a January 22, 1998 ex parte meeting with Commission staff, USTA was in the process of surveying its members to determine the number of switches which would have to be replaced in order to provide equal access capability. USTA surveyed all small and mid-sized telephone companies, including average schedule companies, which were identified in the Bellcore Non-Equal Access Data Report as not providing equal access in order to confirm the accuracy of that data. The attached chart and summary page provide the results of USTA's survey. With 100 percent of the responses received, USTA reports that 75 switches would have to be replaced in order to provide equal access capability. However, the Commission should allow some leeway for there may be cases where it may be more economical to replace a switch rather than incur the costs of installing the necessary upgrades.

USTA would be happy to discuss our results at your convenience. Please call me at (202) 326-7248 if you have any questions.

Respectfully submitted,

A handwritten signature in black ink that reads "Linda Kent". The signature is written in a cursive style with a large, looping initial "L".

Linda Kent
Associate General Counsel

Attachment

cc: Geri Matisse
Kent Nilsson
Kris Monteith
Renee Alexander
Patrick Forster

USTA NON-EQUAL ACCESS SURVEY STATUS REPORT AS OF JANUARY 30, 1998



- ▶ **USTA SURVEY SENT TO SMALL AND MID SIZE TEL COs IDENTIFIED IN BELLCORE'S NON-EQUAL ACCESS DATA (NEAD) REPORT**
 - **37 TEL COs IDENTIFIED IN THE NEAD AS NON-EQUAL ACCESS WITH NONDIGITAL SWITCHES**
 - * **USTA RECEIVED 37 RESPONSES (100%)**
 - ** **25 NONDIGITAL SWITCHES WHICH WILL NEED TO BE REPLACED TO PROVIDE EQUAL ACCESS CAPABILITY**
 - ** **OTHERS WERE REPORTED TO HAVE DIGITAL SWITCHES, BUT 9 OF THOSE DIGITAL SWITCHES DO NOT PROVIDE EQUAL ACCESS CAPABILITY**
 - *** **7 OF THE 9 DIGITAL SWITCHES WERE REPORTED TO REQUIRE REPLACEMENT**
 - **162 TEL COs IDENTIFIED IN THE NEAD AS NON-EQUAL ACCESS WITH DIGITAL SWITCHES**
 - * **USTA RECEIVED 162 RESPONSES (100%)**
 - ** **76 OF THOSE RESPONDENTS' SWITCHES DO NOT TO PROVIDE EQUAL ACCESS CAPABILITY**
 - *** **43 OF THE 76 SWITCHES WERE REPORTED TO REQUIRE REPLACEMENT**
- ▶ **AS OF JANUARY 30, 1998, 75 SWITCH REPLACEMENTS WERE REPORTED AS NECESSARY TO PROVIDE EQUAL ACCESS CAPABILITY. HOWEVER, DEPENDING ON THE EQUAL ACCESS UPGRADE COST OF THE OTHER 35 SWITCHES, SWITCH REPLACEMENT MAY BE THE MOST ECONOMICAL APPROACH.**

COMPANIES WITH NON-EQUAL ACCESS SWITCHES AS IDENTIFIED IN THE LERG

COMPANIES WITH NON-DIGITAL SWITCHES AS OF JANUARY 30, 1998				
- ** DENOTES AVERAGE SCHEDULE COMPANY				
OCN NAME	STATE	OCN	SWITCH ID	SWITCH TYPE
Alltel Penna Inc **	PA	0176	Summerville	SXS
Alltel Penna Inc **	PA	0176	Rockland	SXS
Alltel Penna Inc **	PA	0176	Shippenville	SXS
Alltel Penna Inc **	PA	0176	Sigel	SXS
Alltel Penna Inc **	PA	0176	Timblin	SXS
Citizens Telecom NV	NV	2354		SXS
Clarksvl Mut Tel Co **	IL	0990		GX 5000
Hot Springs Tel Co	MT	2241	HTSPMTXC (EA being provided by tandem switch)	ECS3
Kinsman Mut Tel Co **	IL	1041	KNMNILXAGGO	ITEC EMS 2
Midway Tel Co - MI	MI	0711		ITEC EMS 2
Midway Tel Co - MI	MI	0711		ITEC EMS 2
Midway Tel Co - MI	MI	0711		ITEC EMS 2
Navajo Comm Co Inc	AZ	2275		(8) SXS
NE Nebraska Tel Co **	NE	1576		(3) DCO
Pioneer Tel Coop	OK	2018	DVSNOKXA568	SXS
Pioneer Tel Coop	OK	2018	GRFDOKXA749	SXS
Pioneer Tel Coop	OK	2018	HSNGOKXA963	SXS

COMPANIES WITH NON-DIGITAL SWITCHES AS OF JANUARY 30, 1998**- ** DENOTES AVERAGE SCHEDULE COMPANY**

OCN NAME	STATE	OCN	SWITCH ID	SWITCH TYPE
Pioneer Tel Coop	OK	2018	LOCOOKXA537	SXS
Pioneer Tel Coop	OK	2018	MANTOKXA397	SXS
Pioneer Tel Coop	OK	2018	TMPLOKXA342	SXS
Pioneer Tel Coop	OK	2018	TPTNOKXA667	SXS
RT Communications	WY	3410		(3) SXS
S&T Comm of Dighton	KS	1742	Dighton	DMS 10

COMPANIES WITH NON-EQUAL ACCESS SWITCHES AS IDENTIFIED IN THE LERG

COMPANIES WITH DIGITAL SWITCHES AS OF JANUARY 30, 1998				
- ** DENOTES AVERAGE SCHEDULE COMPANY				
OCN NAME	STATE	OCN	SWITCH ID	SWITCH TYPE
Alaska Tel Co	AK	3017	CRAGAKXA826	Mitel
Alaska Tel Co	AK	3017	DTLKAKXA882	Red Com
Alaska Tel Co	AK	3017	HYBGAKXA285	DMA 10
Alaska Tel Co	AK	3017	SKAGAKXA983	DMS 10
Alaska Tel Co	AK	3017	TLINAKXB324	Red Com
Alaska Tel Co	AK	3017	TOKAKXA833	DMS 10
Alaska Tel Co	AK	3017	HOLSAKXA530	Red Com
Alaska Tel Co	AK	3017	DRCKAKXA323	Red Com
Alaska Tel Co	AK	3017	NUKIAKXADS1	Red Com
Alaska Tel Co	AK	3017	WPSSAKXA846	Red Com
Alaska Tel Co	AK	3017	EDBYAKXADS1	Red Com
Alaska Tel Co	AK	3017	MYCHAKXA946	Red Com
Alaska Tel Co	AK	3017	HYLKAKXADS1	Red Com
Alaska Tel Co	AK	3017	CHSNAKXADS1	Red Com
Arctic Slope Tel Asso	AK	3001		(3) Red Com
Beggs Telephone Co **	OK	1968	BGGSOKXADSO	E10-FIVE
Beresford Muncpl Tel **	SD	1649	BRFRSDXADS1	DMS 10
Bettles Tel Co	AK	3002	BTSAKXA692	Red Com
Bettles Tel Co	AK	3002	JRCPAKXA541	Red Com
Bettles Tel Co	AK	3002	ALKTAKXA968	Mitel
Bristol Bay Tel	AK	3003	IGUGAKXA533	GX 5000
Calloway Tel Co **	MN			ITEC

COMPANIES WITH DIGITAL SWITCHES AS OF JANUARY 30, 1998

- ** DENOTES AVERAGE SCHEDULE COMPANY

OCN NAME	STATE	OCN	SWITCH ID	SWITCH TYPE
Century of Chester **	IA	1126		DMS 10
Dalton Telephone Co	NE	1537		DMS 10
Delcambre Tel Co **	LA	0428	DLCMLAXADSO	DCO
Farmers Tel Co - CO	CO	2188	PSVWLOXCDSO	DCO
Franklin Tel Co	VT	0053	FKLNVTXA285	DMS 10
Gem State Utilities **	WA	2223		(1) DCO
Golden Belt Tel Assn	KS	1777	Ellis, KS	DMS 10
Grand River Mutual	MO	1888	GALTMOXADS0	DMS 10
Grand River Mutual	MO	1888	CNJTMOXADS0	DCO
Grand River Mutual	MO	1888	BRNRMOXADS0	DCO
Grand River Mutual	MO	1888	DNVRMOXADS0	DCO
Grand River Mutual	MO	1888	DRTNMOXADS0	DCO
Grand River Mutual	MO	1888	GNTRMOXADS0	DCO
Grand River Mutual	MO	1888	GRHMMOXADS0	DCO
Grand River Mutual	MO	1888	PRNLMOXADS0	DCO
Grand River Mutual	MO	1888	RVWDMOXADS0	DCO
Grand River Mutual	MO	1888	SHRDMOXADS0	DCO
Grand River Mutual	MO	1888	LEONIAXODS0	DMS 10
Grand River Mutual	MO	1888	BLTNIAXODS0	DCO
Grand River Mutual	MO	1888	LAMNIAXOCGO	DMS 10
Hershey Coop Tel Co **	NE	1561	082450IHE	DMS 10
Interior Tel Co Inc	AK	3011Q	PTLNAKXA454	MDX 384
Interior Tel Co Inc	AK	3011Q	SNPNAKXA383	Red Com
Interior Tel Co Inc	AK	3011Q	KGCVAKXA497	MDX 384
Kadoka Telephone Co	SD	1667	KADSDXADSO	DMS 10

COMPANIES WITH DIGITAL SWITCHES AS OF JANUARY 30, 1998

- ** DENOTES AVERAGE SCHEDULE COMPANY

OCN NAME	STATE	OCN	SWITCH ID	SWITCH TYPE
KLM Telephone Co **	MO	1900	RHHLMOXA395	E10-5
KLM Telephone Co **	MO	1900	METZMOXA484	E10-5
KLM Telephone Co **	MO	1900	RCHRMOMA927	E10-5
KLM Telephone Co **	MO	1900	DRFDMOMA966	E10-5
Leonore Mut Tel Co **	IL	1046		DMS 10
Manchester-Hartland **	MN	1426		DMS 10
North County Tel Co	AK	3026	EAGLAKXACG1	Red Com
Nushagak Tel Coop	AK	3018		DMS 10
Pioneer Tel Coop Inc	OK	2018	APCHOKXADSO	DCO
Pioneer Tel Coop Inc	OK	2018	FTSPOKXADSO	DCO
Pioneer Tel Coop Inc	OK	2018	WYNKOKBDSO	DCO
Rico Tel Co	TX			Redcom
Royal Telephone Co **	IA	1283		DMS 10
Rye Tel Co	CO			Red Com
SE Nebraska Tel Co	NE	1591	FLCYNE1	E10-FIVE
Sodtown Telephone Co **	NE	1590		Harris 20-20
Superior Tel Coop **	IA	1307	SPRRTAXODSO	DMS 10
Tel Ut of Northland **	AK	3030		(1) DMS 10 (1) Red Com
Tohono O Odham Ut AU	AZ	2173		DCO
Union Telephone Co **	SD	1684		Mitel
Vermont Tel Co Inc	VT	3332	WLFRVTXADSO	DCO
W Wahkiakum Cnty Tel	WA	2451	GRRVWAXA465	GTD 5
War Tel Co **	WV	0276	WARWVXADSO	DMS 10
Yukon Tel Co	AK	3025		Red Com

COMPANIES WITH DIGITAL SWITCHES AS OF JANUARY 30, 1998

- ** DENOTES AVERAGE SCHEDULE COMPANY

OCN NAME	STATE	OCN	SWITCH ID	SWITCH TYPE
Yukon Tel Co	AK	3025		Red Com
Yukon Tel Co	AK	3025		Red Com